

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

146

REPLY TO ATTENTION OF:

July 1, 1991

5HS-11

Peter Vagt
Warzyn Engineering Inc.
435 Devon Park Drive
Suite 702
Wayne, PA 19087

Dear Dr. Vagt:

This letter is written as a follow-up to the teleconference of June 27, 1991, between yourself, Dan Sparks of U.S. Fish & Wildlife Service, Mike Kierski of Warzyn and myself. The teleconference concerned various assumptions proposed for inclusion in the Ecological Risk Assessment for the ACS site.

Dan Sparks and I were able to provide you assistance concerning some of your proposed assumptions. However, other proposed assumptions were either beyond our level of knowledge, or required references which were unavailable to us at the time of the teleconference. In those cases where we were without proper references, where the subject was beyond our expertise, or where the assumption was in a "gray" area, we deferred to the risk assessor to defend his selection of the assumption's attributes, by documenting it in the body of the ecological risk assessment. Dan Sparks also offered to contact Mike Kierski later that day to follow-up on some references. This we believed would be the best way to assess the validity of the assumptions, since some of them were beyond our level of expertise.

In a related issue, we would have liked more than the few hours allotted to us to review and discuss your assumptions among ourselves, prior to discussing them with you over the telephone. The two weeks that you claim you were attempting to contact David Charters, would have been ample time to allow other reviewers a chance to provide their input, and for us to contact Dr. Charters. Given the short time frame in which we were operating, we were unable to contact many of the reviewers who had been working on the site, and who may have been able to provide the necessary input concerning those assumptions which Dan Sparks and I were unsure of. To account for the short time frame, and the resulting uncertainties which ensued, we reserved the right to reexamine these assumptions in our formal review of the document.

Dr. Vagt
Follow-up to Ecological Assessment Teleconference
American Chemical Services Site
July 1, 1991
Page 2

If you have any questions, please do not hesitate to call.

Sincerely,

Robert E. Swale

Remedial Project Manager

cc: Dan Sparks, USFWS

David Charters, ERT